

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE

JUNETTE BUTLER

Debtor

:
:
:
:
:
:
:
:
:

CHAPTER 13

CASE NO: 19-14920JKF

**CERTIFICATION OF NO RESPONSE TO DEBTOR'S MOTION TO AVOID
JUDICIAL LIEN OF DISCOVER BANK**

The Debtor, through counsel, hereby avers:

1. On August 13, 2019, Debtor filed the above-captioned motion (the "Motion"). Doc. No. 16.
2. On August 13, 2019, the Motion and Notice of Motion was served upon Discover Bank, attention to its CEO, by certified mail..
3. Pursuant to Local Bankruptcy Rule 9014-3, any response to the Motion was due no later than August 27, 2019.
4. As of this date, no response has been filed to the Motion.

WHEREFORE, Debtor prays that the Court enter an order granting the relief requested in the Motion.

/s/ Alfonso Madrid
ALFONSO MADRID, ESQ.
Attorney for Debtor
757 South 8th St.
Philadelphia PA 19147
(215) 925-1002
(215) 689-4809 (fax)